

1 MANATT, PHELPS & PHILLIPS, LLP
 2 Charles E. Weir (Bar No. 211091)
 3 CWeir@manatt.com
 4 Andrew Beshai (Bar No. 308030)
 5 ABeshai@manatt.com
 6 2049 Century Park East, Suite 1700
 7 Los Angeles, CA 90067
 8 Telephone: (310) 312-4000
 9 Facsimile: (310) 312-4224

10 *Attorneys for Plaintiff*
 11 INTUSCARE INC.

12 NOSSAMAN LLP
 13 DAVID C. LEE (SBN 193743)
 14 dlee@nossaman.com
 15 50 California Street, 34th Floor
 16 San Francisco, CA 94111
 17 Telephone: 415.398.3600
 18 Facsimile: 415.398.2438

19 NOSSAMAN LLP
 20 KASIA PENN (SBN 306056)
 21 kpenn@nossaman.com
 22 18101 Von Karman Avenue, Suite 1800
 23 Irvine, CA 92612
 24 Telephone: 949.833.7800
 25 Facsimile: 949.833.7878

26 *Attorneys for Defendant*
 27 RTZ ASSOCIATES, INC.

28 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA

21 INTUSCARE INC.,

Case No. 4:24-cv-1132-JST

22 Plaintiff,

Assigned to: Hon. Jon S. Tigar

23 v.

**JOINT STIPULATION TO CONTINUE
 DISCOVERY DEADLINES;
 [PROPOSED] ORDER THEREON**

24 RTZ ASSOCIATES, INC.; and DOES 1
 25 through 10,

26 Defendants.

27
 28 Complaint Filed: February 23, 2024
 Amended Complaint Filed: April 2, 2024
 Counterclaims Filed: June 20, 2024

1 Plaintiff IntusCare Inc. (“Intus” or “Plaintiff”) and Defendant RTZ Associates, Inc. (“RTZ”
2 or “Defendant”), by and through their respective counsel, enter into the following stipulation:

3 WHEREAS, on February 23, 2024, Intus filed its Complaint against RTZ;

4 WHEREAS, on April 2, 2024, Intus filed its Amended Complaint against RTZ;

5 WHEREAS, on June 20, 2024, RTZ filed its Counterclaims against Intus;

6 WHEREAS, on June 14, 2024, the Court entered a scheduling order;

7 WHEREAS, a jury trial is currently scheduled to begin on January 12, 2026 at 8:00 a.m.;

8 WHEREAS, on May 12, 2025, the Court granted the parties’ first stipulation to continue
9 discovery deadlines;

10 WHEREAS, discovery deadlines are currently set for the following dates:

- 11 1. Fact Discovery Cut-off: August 4, 2025
- 12 2. Expert Disclosures: August 25, 2025
- 13 3. Expert Rebuttal: September 15, 2025
- 14 4. Expert Discovery Cut-off: October 6, 2025

15 WHEREAS, the parties have been diligent both in propounding and producing discovery in
16 a timely manner. Depositions have begun and will continue throughout August, September, and
17 October. The parties do not at this time anticipate bringing any additional dispositive motions
18 (beyond Intus’ currently pending Motion for Summary Judgment), so the requested continuance of
19 the discovery dates is not expected to result in any new dispositive motions and is not expected to
20 affect the parties’ ability to prepare for and proceed with a January 12, 2026 trial date. The proposed
21 dates do not prejudice either party to appear at trial on the noticed and scheduled dates.

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1 NOW, THEREFORE, the parties stipulate and agree to continue the expert disclosure and
2 rebuttal deadlines by 21 days, the expert discovery cut-off by 26 days, and the fact discovery cut-
3 off by 90 days, as follows:

4 1. Expert Disclosures: September 15, 2025
5 2. Expert Rebuttal: October 6, 2025
6 3. Fact and Expert Discovery Cut-off: October 31, 2025

7 Dated: August 5, 2025

MANATT, PHELPS & PHILLIPS, LLP

10 By: /s/ Charles E. Weir
11 Charles E. Weir
12 Andrew Beshai

13 *Attorneys for Plaintiff*
14 INTUS CARE, INC.

15 Dated: August 5, 2025

NOSSAMAN LLP

16 By: /s/ Kasia Penn
17 David C. Lee
18 Kasia Penn

19 *Attorneys for Defendant*
20 RTZ ASSOCIATES, INC.

[PROPOSED] ORDER

The Court, having reviewed and considered the Parties' Joint Stipulation to Continue Discovery Deadlines, hereby ORDERS THAT:

1. Expert Disclosures: September 15, 2025
2. Expert Rebuttal: October 6, 2025
3. Fact and Expert Discovery Cut-off: October 31, 2025

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: August 5, 2025

Hon. Jon. S. Tigar
United States District Judge

CERTIFICATE OF SERVICE

2 I hereby certify that on August 5, 2025, I caused to be electronically filed a true and
3 correct copy of the foregoing with the Clerk of Court using the CM/ECF system and that
4 all counsel of record will be served via the Notice of Electronic Filing generated by CM/
5 ECF.

/s/ Regina Coprich
Regina Coprich